



CORPORATE HEADQUARTERS

P.O. BOX 27
BOISE, IDAHO 83707-0027

April 30, 2007

Mr. Bill Rogers
Department of Environmental Quality
Air Quality Division
Stationary Source Program
1410 North Hilton
Boise, Idaho 83706-1255

**RE: Pre-Permit Construction Approval PTC Application
J.R. Simplot Company – Caldwell Facility Line 4 Fryer Project**

Dear Mr. Rogers:

Enclosed is a Permit to Construct application addressing the proposed Line 4 Fryer project at the J.R. Simplot Company's (Simplot's) Caldwell facility. Simplot requests that DEQ process this PTC application in accordance with its 15-day Pre-permit Construction Approval Process as established in IDAPA 58.01.01.213.

Simplot retained Geomatrix Consultants (Geomatrix) to prepare this application in accordance with DEQ's January 2001 guidance document for 15-day Pre-permit Construction Approvals. Simplot and Geomatrix held a conference call with DEQ on April 25, 2007, advising DEQ that such an application would be forthcoming. Also in accordance with the requirements for a 15-day Pre-permit Construction Approval, Simplot advertised in the Idaho Press Tribune on Monday April 30, 2007, an invitation to attend a public information meeting to be held at the Caldwell facility's Engineering and Operations Building at the Simplot – Caldwell facility on May 10, 2007 at 2:00 pm.

This project is eligible for pre-permit construction approval because it is not a new major facility or a major modification, Simplot does not plan to employ offsets or netting, and the facility's emissions are unlikely to impact any Class I air quality related values.

This packet includes the PTC application, an email from DEQ's modeling coordinator, Kevin Schilling, stating that a recent modeling analysis of the facility would satisfy the modeling requirements for this project, detailed emission calculations for the proposed fryer, and a copy of the newspaper announcement for the required public meeting. Additionally, this packet contains a check for \$1,000 to cover the PTC application fee.

Although Simplot has prepared this application to meet the requirements of the PTC permitting program, Simplot contends a PTC is not necessary to undertake this project. The

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APR 30 2007
Department of Environmental Quality
State Air Program

project will not increase the actual or potential emissions of any source at the facility, and will actually result in the permanent removal of a source of combustion emissions at the facility.

Please feel free to call me at 208-389-7375 or Sean Williams of Geomatrix at 425-921-4000 if you any questions or need additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Henry Hamanishi".

Henry Hamanishi, P.E.
J.R. Simplot Company

cc: Sean Williams, Geomatrix



IDAHO DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton
Boise, Idaho 83706-1253

RECEIPT

04/30/
DATE

RECEIVED FROM

Scmplot

SOURCE					
Cash <input type="checkbox"/> Check <input checked="" type="checkbox"/> Money Order <input type="checkbox"/> No. <u>76258</u>					
DESCRIPTION					AMOUNT OF PA
<u>PTC App Fee</u>					
<u>Caldwell Fac. Liner Fryer</u>					<u>1000</u>
<u>Project</u>					
RECEIVED BY				TOTAL RECEIVED	
<u>gs</u>					<u>1000</u>
PID	OBS	CA	SUB-OBJ	WP	BE

Nº 82807

Pre-Permit Construction Approval Permit to Construct Application for Simplot-Caldwell

Caldwell, Idaho

Prepared for:

J.R. Simplot Company

P.O. Box 1059

Caldwell, Idaho 83606

April 2007

Project No. 13316.000

RECEIVED

APR 30 2007

Department of Environmental Quality
State Air Program

Pre-Permit Construction Approval Permit to Construct Application for Simplot-Caldwell

Caldwell, Idaho

Prepared for:

J.R. Simplot Company

Caldwell, Idaho

Prepared by:

Geomatrix Consultants, Inc.

19203 36th Avenue West, Suite 101

Lynnwood, Washington 98036

(425) 921-4000

April 2007

Project No. 13316.000

TABLE OF CONTENTS

	Page
1.0 INTRODUCTION	1
2.0 PROJECT DESCRIPTION	3
2.1 EXISTING FACILITY	3
2.2 PROPOSED PROJECT	3
3.0 EMISSION SOURCES AND CALCULATIONS	5
3.1 LINE 4 FRYER	5
4.0 POTENTIALLY APPLICABLE REGULATIONS.....	7
4.1 FEDERAL REQUIREMENTS.....	7
4.1.1 National Emission Standards for Hazardous Air Pollutants.....	7
4.1.2 New Source Performance Standards	7
4.1.3 Prevention of Significant Deterioration.....	7
4.1.4 Title IV Acid Rain Provisions	8
4.1.5 Title V Operating Permit	8
4.1.6 Compliance Assurance Monitoring.....	8
4.2 STATE REQUIREMENTS	9
4.2.1 Permit to Construct Program	9
4.2.2 Tier I Operating Permit	9
4.2.3 General Requirements	9
5.0 DISPERSION MODELING ANALYSIS	10

FIGURES

Figure 1-1	Simplot-Caldwell Site Map
Figure 1-2	Simplot-Caldwell Plot Plan
Figure 2-1	Simplot-Caldwell Process Flow Diagram

APPENDIXES

Appendix A	Public Meeting Newspaper Announcement
Appendix B	DEQ's Permit to Construct Forms
Appendix C	Line 4 Fryer Emission Calculations
Appendix D	Regulatory Applicability Analysis
Appendix E	Dispersion Modeling Analysis Correspondence

PRE-PERMIT CONSTRUCTION/PERMIT TO CONSTRUCT APPLICATION FOR LINE 4 FRYER PROJECT

J.R. Simplot Company – Caldwell Facility
Caldwell, Idaho

1.0 INTRODUCTION

The J.R. Simplot Company (Simplot) has operated a potato processing facility in Caldwell for more than 50 years. The Caldwell facility produces a number of different products including preformed par fried potatoes and French-fried par fried potatoes.

The Caldwell facility is located approximately two miles west of the City of Caldwell on Highway 19 in Canyon County, Idaho. Canyon County is attainment or unclassifiable for all criteria pollutants. Except on the north side where Highway 19 abuts the site, the Caldwell facility is surrounded by Simplot agricultural land. The facility's wastewater treatment plant and ethanol plant are located across Highway 19, north of the main production area. Although Simplot owns the ethanol plant, Idaho Ethanol Processing, LLC leases and operates the ethanol plant¹. Figure 1-1 displays the site location while Figure 1-2 provides a facility plot plan. Although there are variations in production and work schedules, the Caldwell facility operates 24 hours per day, seven days per week, and up to 52 weeks per year.

Currently, the Line 4 fryer and dryer are set up to process French-fried par fried potatoes. Simplot proposes to remove the existing Line 4 fryer and install a new preformed par fried potato fryer similar to the existing Line 1 fryer. The proposed Line 4 fryer, like the existing fryers, would be exhausted to the wet electrostatic precipitator (WESP). Simplot would also remove the Line 4 dryer, however, it would not be replaced.

Simplot requests that the Department of Environmental Quality (DEQ) grant a PTC for the proposed project. Furthermore, Simplot requests that "pre-permit" construction approval be granted within 15 days of DEQ's receipt of this application, pursuant to IDAPA 58.01.01.213. On April 25, 2007 Simplot held a conference call with Henry Hamanishi and Lance Carter of Simplot; Bill Rogers from DEQ; and Sean Williams of Geomatrix Consultants, Simplot's air quality consultant, to satisfy the requirements of IDAPA 58.01.01.213.01.b. A copy of the newspaper notice of the required public meeting, as required by IDAPA 58.01.01.213.02.a, is

¹ In October 2006 Idaho Ethanol Processing obtained a PTC to operate the ethanol plant.

provided in Appendix A. The required public meeting will be held at the Simplot – Caldwell facility’s Engineering and Operations Building at the Caldwell facility on May 10, 2007 from 2 o’clock to 4 o’clock PM.

Simplot will begin constructing the infrastructure for the proposed fryer as soon as DEQ grants permission. Simplot plans to finish construction of the fryer and have it fully operational by early August.

Simplot intends to continue to operate 24 hours per day, seven days per week following completion of the project. This application demonstrates that Simplot can operate the proposed fryer continuously without violating any regulations, and without causing or significantly contributing to a violation of any ambient air quality standards.

Appendix B contains DEQ’s standard PTC Forms CS, GI, EU0, and FRA.

2.0 PROJECT DESCRIPTION

2.1 EXISTING FACILITY

Simplot's Caldwell facility produces par fried French fries and par fried preformed potato products using the same general production process Simplot has used since the facility began operating. Trucks deliver raw potatoes to the facility and Simplot uses a water flume system to wash and transport the potatoes. The potatoes are peeled, cut, blanched, dried, and then fried.

Simplot routes the exhaust from the three fryers through the WESP to ensure compliance with opacity standards. Once the final potato products are frozen, the packaging line packs the product for shipping. The Caldwell facility's three natural gas-fired boilers provide process steam to heat the steam peelers, blanchers, and fryers.²

The Caldwell potato plant currently employs three processing lines (designated Lines 1, 4, and 6). Line 1 produces preformed potato products, while Lines 4 and 6 produce French fries. Each line has a blancher, a dryer, and a fryer.

2.2 PROPOSED PROJECT

The proposed project has only two components: permanently remove the Line 4 dryer from the facility, and replace the existing Line 4 French fry-fryer with a preform potato product-fryer. Figure 2-1 presents a process flow diagram for the facility following completion of this project. Removing the Line 4 dryer will reduce the facility's natural gas consumption and eliminate a source of products of combustion and particulate emissions.

The proposed Line 4 preform fryer, which would permanently replace the existing Line 4 French fry fryer, would have the same manufacturer and be almost identical to the Caldwell facility's existing Line 1 preform fryer. The proposed Line 4 fryer will be located in the same location in the main production building as the existing Line 4 fryer. Although preform fryers are generally longer than French fry fryers, preform fryers contain less oil than French fry fryers. New preform fryers, including the proposed Line 4 fryer, are designed to have as little oil as possible in the entire fryer system to mitigate oil degradation. Because preform products

² The Caldwell facility's April 2005 Tier I Operating Permit renewal application contains additional detail regarding the facility's process description.

require a longer dwell time in the fryer, the preform fryer's maximum throughput rate³ is approximately one-third of the French fry fryer's maximum throughput rate⁴.

The quantity of steam necessary to heat a fryer depends upon the quantity of oil in the fryer, as well as the quantity of product processed by the fryer. Because the quantity of oil in the proposed Line 4 fryer will be less than the amount in the existing Line 4 fryer, and because the product throughput will decrease, Simplot expects the hourly and annual steam demand attributable to the Line 4 fryer to decrease after completion of the project.

The proposed project will not affect the facility's other fryers and dryers, air makeup units (AMUs), waste water treatment plant, anaerobic digester, or biogas flare.

³ Approximately 10,800 pounds finished product per hour, or 94,608,000 pounds per year for a preform fryer.

⁴ Approximately 38,000 pounds finished product per hour, or 332,880,000 pounds per year for a French fry fryer.

3.0 EMISSION SOURCES AND CALCULATIONS

The proposed project will affect only three emission sources at the facility: the Line 4 dryer, which will be permanently removed, the Line 4 fryer, which will be controlled by the WESP, and the steam generating plant, which will have a reduced steam demand. The proposed project will not affect the potential to emit (PTE) or actual emissions of any other sources at the facility.

3.1 LINE 4 FRYER

As with the facility's existing fryers, the proposed fryer will be heated with steam from the facility's steam generating plant. The proposed fryer will not generate any combustion-related emissions, however the fryer will generate emissions of particulate matter and volatile organic compounds (VOCs) associated with normal operation.

Based on uncontrolled particulate matter source test data collected on the Caldwell facility's Line 1 fryer (a preform fryer) and existing Line 4 fryer (a French fry fryer), preform fryers emit more particulate matter per thousand pounds of throughput than French fry fryers. However, because of their higher throughput rates, the Caldwell facility's French fry fryers emit more particulate matter than the facility's preform fryers on an actual or potential mass basis.

VOC source test data collected on the Caldwell facility's Plant 1 Line 1 Preform fryer and the Caldwell facility's Plant 1 Line 2 French fry fryer demonstrates preform fryers also emit more VOCs per thousand pounds of throughput than French fry fryers. However, because of their higher throughput rates, the Caldwell facility's French fry fryers emit more VOCs than the facility's preform fryers on an actual or potential mass basis.

Appendix C provides detailed uncontrolled emission calculations for the existing and the proposed Line 4 fryers.

In 2000, Simplot installed a GeoEnergy wet electrostatic precipitator (WESP) at the Caldwell facility to control opacity from the Line 1 fryer. In the process of controlling opacity, the WESP also controls particulate matter emissions from the fryers. Simplot currently vents all three fryers' emissions through this control device and will continue to do so upon completion of the proposed project⁵. As demonstrated by the emission calculations in Appendix C, the total fryer emissions of PM10 and VOCs routed to the WESP will decrease after completion of the proposed project. Previous source testing events have demonstrated that the WESP meets the Line 1 fryer particulate

emission limits, even when all three fryers are operating. Simplot does not propose any changes to the WESP PM10 emission limit. Additionally, the proposed project will not affect the WESP VOC potential to emit.

Table 3-1 compares the PM10 and VOC potential to emit from the existing Line 4 French fry fryer, and the proposed Line 4 preform product fryer, prior to being routed into the WESP.

The WESP is located just north of the main production building; its location is presented on Figure 1-2. DEQ standard forms in Appendix B provide additional information about the WESP and the proposed fryer. Because the proposed project will not cause any emission increases, Appendix B does not contain Form EI, Emission Inventory⁶.

TABLE 3-1
EXISTING AND PROPOSED FRYERS' UNCONTROLLED POTENTIAL TO EMIT
Simplot – Caldwell
Caldwell, Idaho

Pollutant	Existing Line 4 French fry Fryer Potential to Emit		Proposed Line 4 Preform Product Fryer Potential to Emit	
	(lb/hr)	(TPY)	(lb/hr)	(TPY)
PM10	10.2	44.8	5.1	22.3
VOC	6.8	30.0	4.2	18.5

⁵ Although Simplot routes the exhaust from all three fryers into the WESP, only the Line 1 fryer has emission limits and a requirement that fryer emissions pass through the WESP.

⁶ In a April 26, 2007 email, Bill Rogers of DEQ confirmed Form EI is not necessary for this PTC application.

4.0 POTENTIALLY APPLICABLE REGULATIONS

The Caldwell facility and the proposed fryer are subject to federal and state air pollution control regulations. This section discusses each applicable regulation and details why other federal and state regulations are not applicable.

4.1 FEDERAL REQUIREMENTS

4.1.1 National Emission Standards for Hazardous Air Pollutants

EPA has established National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR 63 to regulate HAP emissions from various industrial sources and activities. However, none of these standards apply to the Caldwell facility's sources because, as demonstrated by the facility's April 2005 Tier I application, the facility is not a major source of HAPs in its existing configuration. The proposed Line 4 Fryer project will not increase the facility's actual or potential HAP emissions.

4.1.2 New Source Performance Standards

EPA has established New Source Performance Standards (NSPS) for new, modified, or reconstructed facilities and source categories. EPA has promulgated NSPS sections that potentially apply to the Caldwell facility's industrial boilers. However, because the proposed Line 4 Fryer project would not modify any of the facility's boilers, their NSPS applicability status will not change as a result of this project.

There are no NSPS sections that potentially apply to potato product fryers.

4.1.3 Prevention of Significant Deterioration

Potato processing facilities are not designated facilities under 40 CFR 52.21(b); as such, these types of facilities are deemed minor sources for the purposes of the Prevention of Significant Deterioration (PSD) program unless emissions of a regulated pollutant exceeds 250 tons per year. The facility's PTE of regulated pollutants is less than the 250 ton major source threshold. Accordingly, the Caldwell facility is not a major source under the PSD program.

However, boilers 8, 9, and 10 have a potential combined heat input that exceeds 250 MMBtu/hr. Because they are fired with natural gas, a fossil fuel, the boilers are defined as a designated facility under IDAPA 58.01.01.006.27(v) and subject to a 100 tons per year (tpy) major source threshold. The boilers have potential NO_x and CO emissions that exceed 100 tpy. EPA terms support facilities that are major sources (with respect to PSD) "nested" sources

within a minor source facility. Only modifications to the boilers that exceed the Significant Emission Rates (IDAPA 58.01.01.006.90) trigger review under the PSD program. There have been no modifications to the boilers and none are proposed with this project.

4.1.4 Title IV Acid Rain Provisions

Title IV of the federal Clean Air Act regulates sulfur dioxide and oxides of nitrogen emissions from fossil fuel-fired electrical generation facilities. The Caldwell facility's boilers combust natural gas, however the Caldwell facility does not generate electricity. Accordingly, Simplot's Caldwell facility is not subject to the Title IV Acid Rain Provisions in the Clean Air Act.

4.1.5 Title V Operating Permit

Title V of the federal Clean Air Act requires facilities with the potential to emit more than 100 tons of a regulated criteria pollutant, 10 tons of a single HAP, or 25 tons of all HAP combined on an annual basis to obtain a Title V Operating Permit. EPA delegated this regulatory program to DEQ. The Simplot-Caldwell facility, which is subject to this program because its annual CO, NO_x, and PM₁₀ PTE exceed the applicability threshold, submits all requisite Title V applications and reports to DEQ.

4.1.6 Compliance Assurance Monitoring

EPA established the Compliance Assurance Monitoring (CAM) program to regulate emission sources that employ a control device to maintain compliance with an enforceable emission limit. 40 CFR Part 64.2 establishes the three applicability criteria for the CAM program:

- The unit is subject to an emission limit,
- The unit uses a control device to achieve compliance with that limit, and
- The unit has pre-control emissions of 100 percent of the major source threshold.

As detailed in the Caldwell facility's April 2005 Tier I Operating Permit renewal application, none of the facility's emission units are subject to CAM.

The proposed Line 4 fryer will not be subject to CAM. Simplot does not propose any mass emission limits for the Line 4 fryer, and its pre-control emissions are less than the major source threshold, 100 tons per year, as demonstrated in Appendix C.

4.2 STATE REQUIREMENTS

4.2.1 Permit to Construct Program

DEQ's PTC regulations require all facilities to obtain a PTC or a documented exemption determination before beginning construction of a new source of air pollution or modifying an existing source in a manner that would cause its emissions to increase. Simplot has worked with DEQ to establish a PTC for all of the air pollution sources at the Caldwell facility. This document complies with the PTC program requirements for the Line 4 fryer project.

4.2.2 Tier I Operating Permit

As mentioned previously, EPA delegated the Title V Operating Permit program to DEQ. The Caldwell facility's annual CO, NO_x, and PM₁₀ PTE exceed the 100 ton per year applicability threshold. The Caldwell facility's Tier I Operating Permit currently in effect will expire on March 8, 2012.

4.2.3 General Requirements

Idaho has no performance or technology standards specifically for potato product fryers. The only state requirements directly applicable to the project are rules that address general air quality issues, including:

- opacity [IDAPA 58.01.01.625]
- particulate matter emissions from new process equipment [IDAPA 58.01.01.701]
- nuisance odors [IDAPA 58.01.01.776.01]

The 'particulate emissions from new process equipment' standard applies to the proposed fryer. Simplot will route the proposed Line 4 fryer through the facility's existing WESP to control particulate matter emissions. The WESP hourly PM₁₀ emission limit is less than the allowable emission rate derived from the equation in IDAPA 58.01.01.701.

A complete listing of the applicable and inapplicable federal and state air quality regulations, as well as additional information regarding the applicability determinations, is included as Appendix D.

5.0 DISPERSION MODELING ANALYSIS

The proposed Line 4 fryer project will not cause any actual or potential emission increases at the Caldwell facility. The proposed project will not increase the WESP emission rates, and the project will eliminate the Line 4 dryer and its emissions. Additionally, the proposed project will not affect the dispersion characteristics of any sources at the facility.

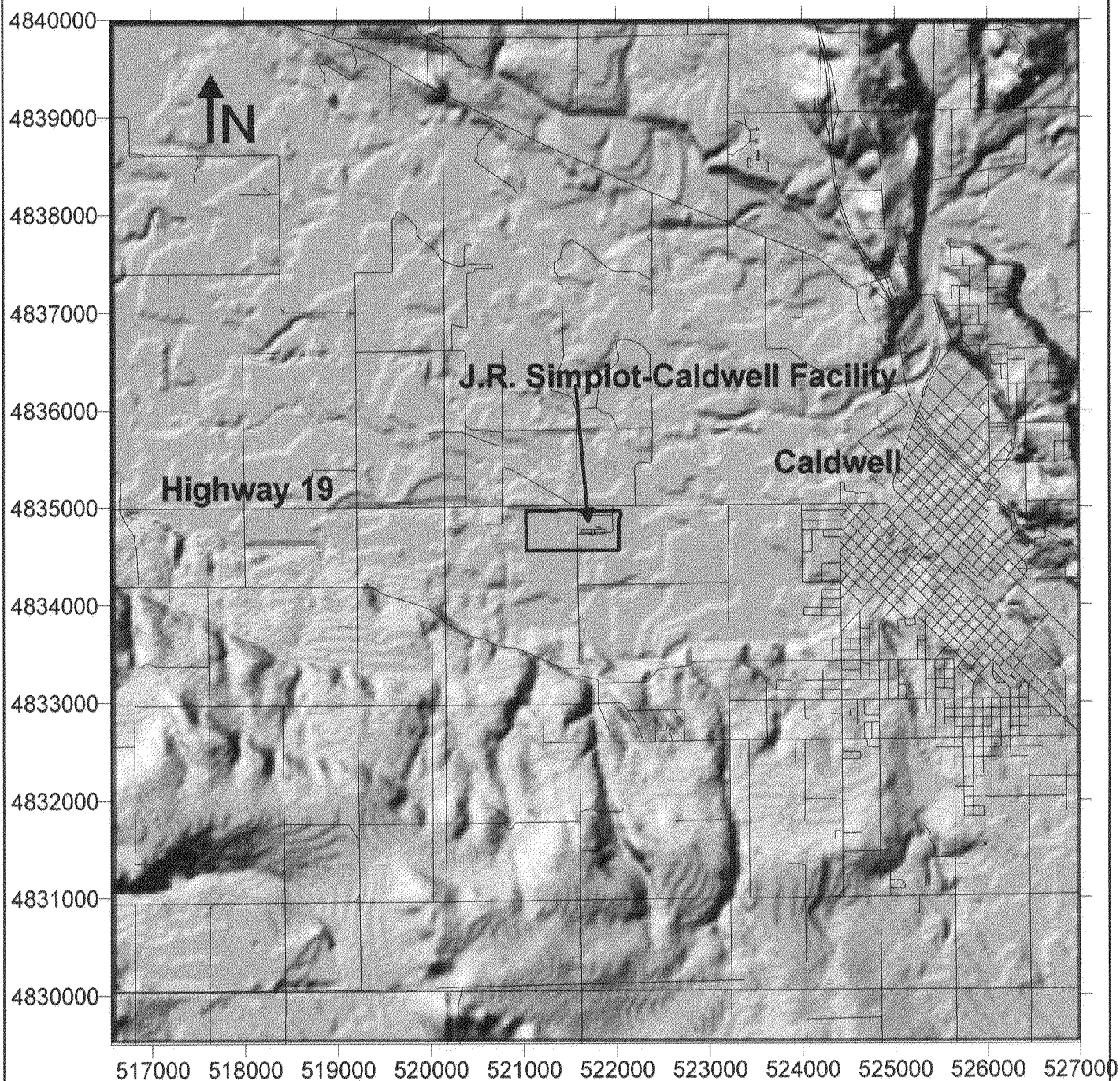
In June 2004, MFG, Inc. completed a facility-wide dispersion modeling analysis of the Caldwell facility using the ISCST3 dispersion model⁷. DEQ reviewed and approved this analysis when it was submitted. The June 2004 analysis demonstrated compliance with all of the applicable ambient air quality standards. Because the proposed Line 4 fryer project would not increase emissions or change any dispersion characteristics, Kevin Schilling, DEQ's modeling coordinator, approved the use of the June 2004 modeling analysis to support this PTC application.

Appendix E presents email correspondence between Kevin Schilling and Sean Williams that addresses the modeling analysis. This PTC application does not include DEQ's modeling form because the existing modeling was not revised.

As demonstrated by the June 2004 dispersion modeling analysis, the Caldwell facility complies with all applicable ambient air quality standards.

⁷ The MFG, Inc. employees that conducted the June 2004 modeling analysis are currently employed by Geomatrix Consultants, Inc.

FIGURES



0 2000 4000 6000 8000

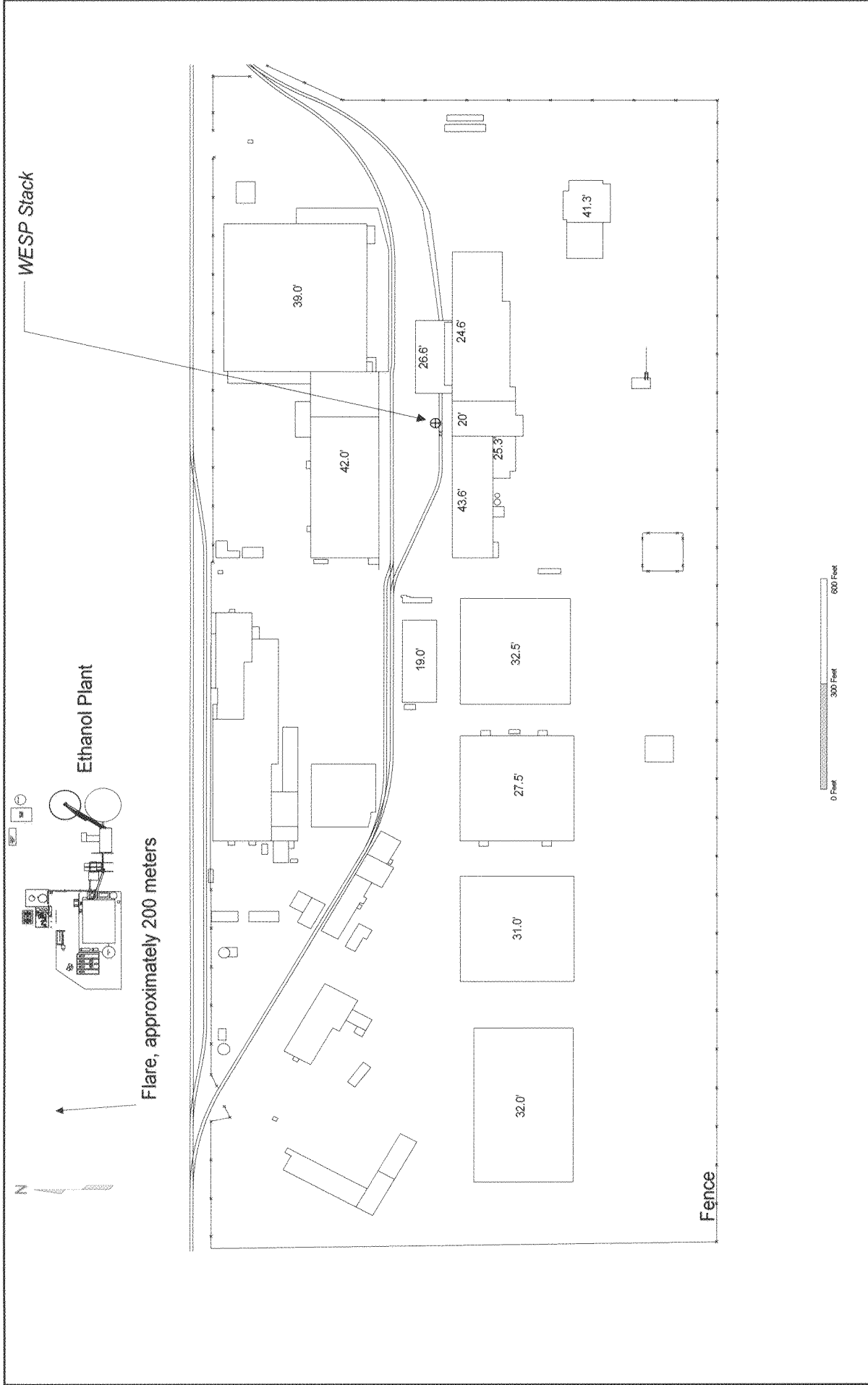
Map Scale (meters)



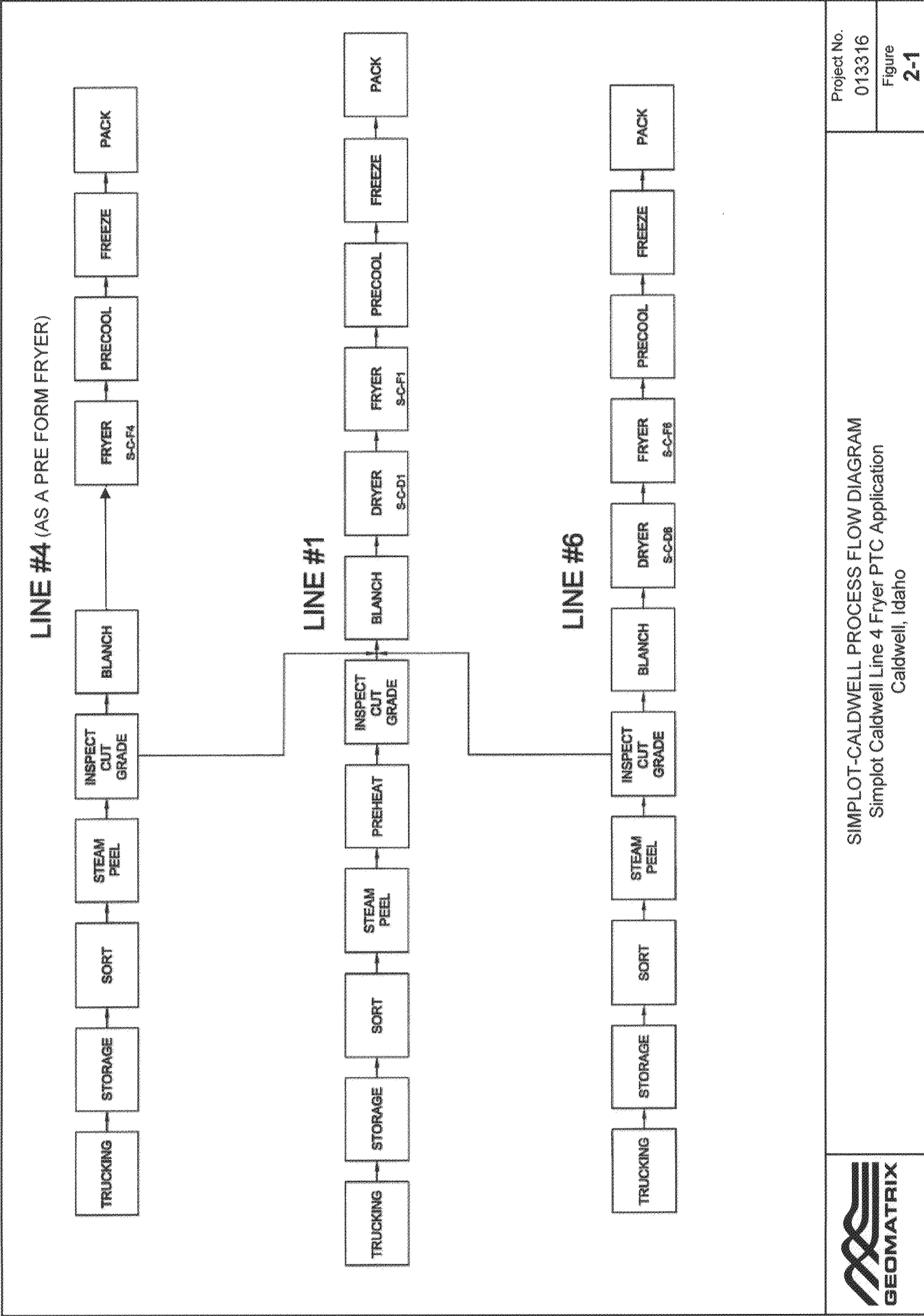
SIMPLOT-CALDWELL SITE MAP
 Simplot Caldwell Line 4 Fryer PTC Application
 Caldwell, Idaho

Project No.
 013316

Figure
1-1



<div data-bbox="1386 1759 1474 1969" data-label="Image"> </div> <div data-bbox="1386 720 1487 1266" data-label="Section-Header"> <p>SIMPLOT-CALDWELL PLOT PLAN Simplot Caldwell Line 4 Fryer PTC Application Caldwell, Idaho</p> </div>	Project No. 013316	Figure 1-2
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APPENDIXES

APPENDIX A

Public Meeting Newspaper Announcement

LEGAL NOTICES

Continued From
Page 7 Community

SUMMONS

To: JAMES A. KIRKMAN and
TONYA KIRKMAN, husband
and wife,

You have been sued by NCO Financial Systems, Inc. the Plaintiff, in the District Court in and for CANYON COUNTY, Idaho, Case No. CV-06-13908.

The nature of the claim against you is collection of money owed by you. Any time after 20 days following the last publication of this summons, the court may enter a judgment against you without further notice, unless prior to that time you have filed a written response in the proper form, including the Case No. CV-06-13908, and paid any required filing fee to the Clerk of the Court at 1115 Albany, Caldwell, ID 83605, telephone (208) 454-7525, and served a copy of your response on the Plaintiff.

DATED this 25th day of April, 2007.

MAE CLOUGH
Personal Representative

JULIE ADAMS DEFORD
DEFORD LAW, P.C.
ATTORNEY FOR THE PERSONAL
REPRESENTATIVE
317 12TH AVENUE SOUTH
NAMPA, IDAHO 83651
TELEPHONE: (208) 461-3667
FACSIMILE: (208) 461-7077

IDAHO STATE BAR NUMBER 5420

Apr. 30, 2007
May 7, 14, 2007

04537252
NOTICE TO CREDITORS
(I.C. 15-3-801)

CASE NO. CV-2007-0136H

In the District Court of the
Third Judicial District of the
State of Idaho, in and for the
County of Owyhee

**IN THE MATTER OF THE
ESTATE OF**

ANNUAL MEETING

West Valley Medical Center
Auxiliary, Inc.

Purpose: Election of directors and
officers, annual reports and regular
business.

Place: Kaley Medical Center Auditorium,
10th and Logan, Caldwell, ID

Time: 12:00 noon

Apr. 30, 2007
May 7, 2007

04537264
**NOTICE OF HEARING ON
PETITION FOR APPOINTMENT
OF TEMPORARY AND
PERMANENT GUARDIAN OF
MINOR CHILDREN**

CASE NO. CV-2007-3080°C

In the District Court of the
Third Judicial District of the
State of Idaho, in and for the
County of Canyon

CLASSIFIEDS

subject to conditions, rules and procedures as described at the sale and which can be reviewed at www.northwesttrustee.com or USA-Foreclosure.com. The sale is made without representation, warranty or covenant of any kind. (TS# 17174.21213) 1002.70045-FEI

Apr. 16, 23, 30, 2007
May 7, 2007

Notice of Trustee's Sale Idaho Code 45-1506 Today's date: March 26, 2007 File No.: 7023.12860 Sale date and time (local time): July 26, 2007 at 11:00 AM Sale location: in the lobby of Pioneer Title Company, 610 South Kimball, Caldwell, ID 83605 Property address: 324 School Avenue Nampa, ID 83686 Successor Trustee: Northwest Trustee Services, Inc., an Idaho Corporation P.O. Box 997 Bellevue, WA 98009 (425) 586-1900 Deed of Trust information Original grantor: Mike Studer and Diane Studer, husband and wife Original Trustee: Transnation Title & Escrow Original beneficiary: Mortgage Electronic Registration Systems, Inc., solely as nominee for New Freedom Mortgage Corporation

04536350

Individuals with disabilities may request meeting accommodations by contacting the Director's office at the Idaho Department of Fish and Game directly at 208-334-5159 or through the Idaho Relay Service at 1-800-377-2529 (TDD)

Apr. 23, 30, 2007
May 7, 2007

LEGAL NOTICE

The J.R. Simplot Company will hold an informational meeting in accordance with IDAPA 58.01.01.213.02(a) on May 10, 2007 at the J.R. Simplot - Caldwell facility's Engineering and Operations Building located at Simplot Plant Gate 2 on Highway 19, two miles west of Caldwell, Idaho from 2:00 to 4:00 PM. The purpose of this meeting will be to discuss a Permit to Construct application for replacing a potato product fryer at the Caldwell facility. The Simplot - Caldwell facility is located at two miles west of Caldwell on Highway 19.

Apr. 30, 2007

05564688

APPENDIX B

DEQ's Permit To Construct Forms



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton
 Boise, ID 83706
 For assistance: 208-373-0502

PERMIT TO CONSTRUCT APPLICATION

Applicants, please see instructions on page 2 before filling out the form.

DEQ Staff, please see instructions for handling this form on page 3.

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER			
1. Company Name	J.R. Simplot Company		
2. Facility Name	Caldwell Plant	3. Facility ID No.	027-00009
4. Brief Project Description - One sentence or less	Line 4 Fryer Project		
PERMIT APPLICATION TYPE			
5. <input type="checkbox"/> New Facility <input type="checkbox"/> New Source at Existing Facility <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modify Existing Source: Permit No.: T1-2007.0010 Date Issued: January 17, 2007 <input type="checkbox"/> Required by Enforcement Action: Case No.: _____			
6. <input type="checkbox"/> Minor PTC <input type="checkbox"/> Major PTC			
FORMS INCLUDED			
Included	N/A	Forms	DEQ Verify
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form GI – Facility Information	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU0 – Emissions Units General	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU1 - Industrial Engine Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU2 - Nonmetallic Mineral Processing Plants Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU3 - Spray Paint Booth Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU4 - Cooling Tower Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU5 – Boiler Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form HMAP – Hot Mix Asphalt Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CBP - Concrete Batch Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form BCE - Baghouses Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form SCE - Scrubbers Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Forms EI-CP1-EI-CP4 - Emissions Inventory– criteria pollutants (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	PP – Plot Plan	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Forms MI1-MI4 – Modeling (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form FRA – Federal Regulation Applicability	<input type="checkbox"/>

DEQ USE ONLY
Date Received
Project Number
Payment / Fees Included? Yes <input type="checkbox"/> No <input type="checkbox"/>
Check Number



DEQ AIR QUALITY PROGRAM
1410 N. Hilton
Boise, ID 83706
For assistance: (208) 373-0502

PERMIT TO CONSTRUCT APPLICATION

Please see instructions on page 2 before filling out the form.

IDENTIFICATION

Company Name: J.R. Simplot Company	Facility Name: Caldwell Plant	Facility ID No: 027-00009
Brief Project Description:	Line 4 Fryer Project	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	LINE 4 PREFORM FRYER		
2. EU ID Number:	S-C-F4A		
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: T1-2007.0010 Date Issued: January 17, 2007		
4. Manufacturer:	GEM EQUIPMENT COMPANY		
5. Model:	PREFORM FRYER		
6. Maximum Capacity:	10,800 POUNDS OF PRODUCT/HOUR		
7. Date of Construction:	JUNE 2007		
8. Date of Modification (if any)	NA		
9. Is this a Controlled Emission Unit?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:	Wet Electrostatic Precipitator					
11. Date of Installation:	2000		12. Date of Modification (if any):			
13. Manufacturer and Model Number:	GeoEnergy International Corp; E-Tube Model					
14. ID(s) of Emission Unit Controlled:	S-C-F1, S-C-F4A, S-C-F6					
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
			na	na	na	na

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency. Most recent source test approval letter attached for WESP

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	24 HOURS/DAY; 7 DAYS/WEEK; 50 WEEKS/YEAR
19. Maximum Operation	24 HOURS/DAY; 7 DAYS/WEEK; 52 WEEKS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input type="checkbox"/> Material Usage Limit(s):	
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports
<input checked="" type="checkbox"/> Other:	MAINTAIN EXISTING WESP EMISSION LIMITS
21. Rationale for Requesting the Limit(s):	



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1445 North Orchard • Boise, Idaho 83706-2239 • (208) 373-0550

Dirk Kempthorne, Governor
C. Stephen Allred, Director

April 7, 2004

CERTIFIED MAIL NO. 7099 2110 0009 1975 9361

Mr. Bill Rutherford, Environmental Manager
J.R. Simplot Company, Food Group
P.O. Box 1059
Caldwell, ID 83606

Re: Review of the September 18, 2003 Particulate Matter and Visible Emissions Performance Test conducted on the Plant 2 Line 1 Fryer at the JR Simplot Company Caldwell, Idaho Potato Processing Facility.

Dear Mr. Rutherford:

On October 21, 2003, the Department of Environmental Quality (DEQ) received a particulate matter (PM) and visible emissions (VE) performance test report for the Plant 2 Line 1 Fryer (Fryer), which is owned and operated by J. R. Simplot Food Group (Simplot). Spidell and Associates conducted the performance test on behalf of Simplot on September 18, 2003. The purpose of the test was to fulfill the initial performance testing requirement set forth in Tier I Operating Permit No.027-00009, issued October 4, 2002 (OP#027-00009).

Based on a review of the submitted test report, DEQ has determined that the PM test report data for the Fryer successfully demonstrated compliance with the PM emission limit of 10.88 lb/hr specified in Section 2.3, page 14, of OP#027-00009 during the September 18, 2003 performance test. The maximum emission rate measured during the test period was 2.24 lb/hr at an average operating rate of 9,207 lb/hr finished product. DEQ accepts the PM testing as a demonstration of compliance for this emission source.

In addition, Section 2.14, page 15 of OP#027-00009 states "If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission rate limits in Permit Condition 2.4, no further testing shall be required during the permit term." The average PM emission rate during the September 18, 2003 test period was 1.98 lb/hr, which is 18% of the permitted emission rate. Therefore, no additional PM testing is required for the Plant 2 Line 1 Fryer stack during the remainder of the permit term of OP#027-00009.

Three process/control equipment operating parameters were monitored during the performance test and are directly pertinent to control equipment and process rate limitations set forth in OP#027-00009 (reference Sections 1.24, page 10; Section 2.8, Page 15; and Section 2.9. Page 15). These parameters are as follows:

Mr. Bill Rutherford – letter
April 7, 2004
Page 2

Simplot's average production rate, in finished pounds: **9,207 pounds.**

Simplot's lowest reported pressure drop across the air pollution control device during the performance test: **-1.714 inches**

Simplot's lowest reported scrubbing media flow rate during the performance test: **316 gallons per minute**

Please be advised that the above control equipment and process parameters documented during the performance test correlate either directly or indirectly to post-test operation limitations described in OP#027-00009 and in the Rules for the Control of Air Pollution in Idaho. These limitations apply to Simplot's Fryer throughput and the operation of the air pollution control device (Wet ESP), and were effective immediately upon completion of the September 18, 2003 performance test.

The performance test report was received by DEQ thirty-three (33) days after completion of on-site testing. Please note that Section 1.24, page 10, of OP#027-00009 requires, in part, that emission-testing reports must be submitted within thirty (30) days of completion of compliance testing. Simplot's failure to submit the test report within thirty (30) days of test completion appears to constitute a violation of this permit condition.

Please call me at (208) 373-0433, if you have any questions regarding this letter or the performance test review.

Sincerely,



Tim T. Trumbull
Air Quality Inspector

TTT:cm a:\protocol\simplotcaldwell Fryer review letter

cc: Z. Klotovich, Tech Services
Stationary Source Program Office
P. Rayne(AIRS #027-00009)/SOSF
Mike McGown/BRO Source File



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton
 Boise, ID 83706
 For assistance: (208) 373-0502

PERMIT TO CONSTRUCT APPLICATION

IDENTIFICATION

Company Name: J.R. Simplot Company	Facility Name: Caldwell Plant	Facility ID No: 027-00009
---------------------------------------	----------------------------------	------------------------------

Brief Project Description: Line 4 Envr. Project

APPLICABILITY DETERMINATION

1. Will this project be subject to 1990 CAA Section 112(g)? (Case-by-Case MACT)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*	<input type="checkbox"/> DON'T KNOW
* If YES then applicant must submit an application for a case-by-case MACT determination [IAC 567 22-1(3)"b" (8)]			
2. Will this project be subject to a New Source Performance Standard? (40 CFR part 60)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*	<input type="checkbox"/> DON'T KNOW
*If YES please identify sub-part: _____			
3. Will this project be subject to a MACT (<u>M</u> aximum <u>A</u> chievable <u>C</u> ontrol <u>T</u> echnology) regulation? (40 CFR part 63)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*	<input type="checkbox"/> DON'T KNOW
*If YES please identify sub-part: _____			
THIS ONLY APPLIES IF THE PROJECT EMITS A HAZARDOUS AIR POLLUTANT – SEE TABLE A FOR LIST			
4. Will this project be subject to a NESHAP (<u>N</u> ational <u>E</u> mission <u>S</u> tandards for <u>H</u> azardous <u>A</u> ir <u>P</u> ollutants) regulation? (40 CFR part 61)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*	<input type="checkbox"/> DON'T KNOW
*If YES please identify sub-part: _____			
5. Will this project be subject to PSD (<u>P</u> revention of <u>S</u> ignificant <u>D</u> eterioration)? (40 CFR section 52.21)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES	<input type="checkbox"/> DON'T KNOW
6. Was netting done for this project to avoid PSD?	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*	<input type="checkbox"/> DON'T KNOW
*If YES please attach netting calculations			

IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS CALL 1-208-373-0502



DEQ AIR QUALITY PROGRAM
1410 N. Hilton
Boise, ID 83706
For assistance: (208) 373-0502

PERMIT TO CONSTRUCT APPLICATION

Please see instructions on page 2 before filling out the form.

All information is required. If information is missing, the application will not be processed.

IDENTIFICATION

1. Company Name	J.R. Simplot Company
2. Facility Name (if different than #1)	Caldwell Plant
3. Facility I.D. No.	027-00009
4. Brief Project Description:	Line 4 Fryer Project


FACILITY INFORMATION

5. Owned/operated by: (√if applicable)	<input type="checkbox"/> Federal government <input type="checkbox"/> County government <input type="checkbox"/> State government <input type="checkbox"/> City government	
6. Primary Facility Permit Contact Person/Title	Lance Carter, Environmental Manager	
7. Telephone Number and Email Address	208.454.4360, 208.250.6039; lance.carter@simplot.com	
8. Alternate Facility Contact Person/Title	Henry Hamanishi, Director of Engineering	
9. Telephone Number and Email Address	208.389.7375; henry.hamanishi@simplot.com	
10. Address to which permit should be sent	P.O. Box 1059	
11. City/State/Zip	Caldwell, Idaho 83606	
12. Equipment Location Address (if different than #9)	2 miles west of Caldwell on Highway 19	
13. City/State/Zip	83606	
14. Is the Equipment Portable?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
15. SIC Code and NAISC Code	SIC: 2037 Secondary SIC (if any):	NAICS: 311411
16. Brief Business Description and Principal Product	Potato Processing	
17. Identify any adjacent or contiguous facility that this company owns and/or operates	Ethanol plant is owned by Simplot but leased and operated by Idaho Ethanol Processing	

PERMIT APPLICATION TYPE

18. Specify Reason for Application	<input type="checkbox"/> New Facility <input type="checkbox"/> New Source at Existing Facility	
	<input checked="" type="checkbox"/> Modify Existing Source: Permit No.: T1-2007.0010 Date Issued: January 17, 2007	
	<input type="checkbox"/> Unpermitted Existing Source:	
	<input type="checkbox"/> Required by Enforcement Action: Case No.:	

CERTIFICATION

IN ACCORDANCE WITH IDAPA 58.01.01.123 (RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO), I CERTIFY BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE, AND COMPLETE.	
19. Responsible Official's Name/Title	Jim Englar, Unit Director
20. RESPONSIBLE OFFICIAL SIGNATURE	 Date: 4/26/07

APPENDIX C

Line 4 Fryer Emission Calculations

EXISTING LINE 4 FRYER (prior to WESP)

French Fry Process Emissions

Pollutant	Emission Factor (lb/Mlb) ^(b)	Potential to Emit		Max Product Throughput	38,000	Total lb/hr
		lb/hr	TPY			
PM-10	2.69E-01	10.22	44.77	Total Dryer Operation	8,760	hours/yr
VOC	1.80E-01	6.84	29.96			

PM10 emission factor from May 1999 source test on the J.R. Simplot Caldwell facility's Line 4 French fry fryer, uncontrolled.

VOC emission factor from May 1995 source test on a Plant 1, Line 2 French fry fryer at the J.R. Simplot Caldwell facility.

PROPOSED LINE 4 FRYER (prior to WESP)

Preform Product Process Emissions

Pollutant	Emission Factor (lb/Mlb) ^(b)	Potential to Emit		Max Product Throughput	10,800	Total lb/hr
		lb/hr	TPY			
PM-10	4.72E-01	5.10	22.33	Total Dryer Operation	8,760	hours/yr
VOC	3.90E-01	4.21	18.45			

PM10 emission factor from May 1999 source test on the J.R. Simplot Caldwell facility's Line 1 preform fryer, uncontrolled.

VOC emission factor from May 1995 source test on a Plant 1, Line 1 Preform fryer at the J.R. Simplot Caldwell facility.

APPENDIX D

Regulatory Applicability Analysis

Project-Specific Potentially Applicable Requirements

I. Federal Regulatory Requirements

Emissions Unit	Citation under Federal Regulations	Applicable Requirement	Description of Requirements or Standards
Facility Wide	40 CFR Part 52	No	Approval and Promulgation of Implementation Plans; Rules for Prevention of Significant Deterioration. <ul style="list-style-type: none"> The Caldwell facility is not a major source with respect to the Prevention of Significant Deterioration program. Facility-wide emissions are less than the applicability threshold.
Affected Facilities: Boilers 8, 9, and 10 Facility-Wide	40 CFR Part 60 Subpart Dc	No	Standards of Performance for New Stationary Sources. <ul style="list-style-type: none"> The Caldwell facility's boilers are not subject to Subpart Dc because they were constructed prior to the applicability date and have not been modified since their installation at the facility. The boilers will not be modified as a result of the proposed Line 4 fryer project. None of the other sources associated with the proposed project are subject to NSPS subparts.
Facility Wide	40 CFR Part 61, Subpart M	Yes	National Emission Standards for Hazardous Air Pollutants, Asbestos.
Affected Sources	40 CFR Part 63, Subpart A	No	National Emission Standards for Hazardous Air Pollutants for Source Categories. <ul style="list-style-type: none"> The Caldwell facility is not a major source of HAP and as such the NESHAP program does not apply to this facility.
Affected Sources	40 CFR Part 64	No	Compliance Assurance Monitoring <ul style="list-style-type: none"> None of the sources at the Caldwell facility are subject to the requirements of CAM because they either do not have a control device or their pre-control device emissions are less than the applicable major source threshold.
Facility Wide	40 CFR Part 68	No	Chemical Accident Prevention Provisions <ul style="list-style-type: none"> The Caldwell facility is not currently subject to this regulatory program. Per 68.10(a), the facility must comply with the Provisions' requirements as soon as the quantity of a regulated substance is greater than its threshold quantity in a process.
Facility Wide	40 CFR Part 70	Yes	State Operating Permit Program. <ul style="list-style-type: none"> The Caldwell facility is a major source with respect to the Title V operating permit program.
Facility Wide	40 CFR Part 82	Yes	Chlorofluorocarbon Regulations.

Potentially Applicable Requirements

Potentially applicable State requirements are presented in the following table.

Idaho Regulatory Requirements

Emission Unit	Citation under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
Facility Wide	130	Yes	STARTUP, SHUTDOWN, SCHEDULED MAINTENANCE, SAFETY MEASURES, UPSET AND BREAKDOWN
Facility Wide	131	Yes	EXCESS EMISSIONS.
Facility Wide	132	Yes	• Applicability. CORRECTION OF CONDITION.
Facility Wide	133	Yes	• Excess emission events must be corrected with all practical speed. STARTUP, SHUTDOWN AND SCHEDULED MAINTENANCE REQUIREMENTS. • Prescribes procedures for where startup, shutdown, or scheduled maintenance is expected to result in an excess emissions event.
Facility Wide	134	Yes	UPSET, BREAKDOWN AND SAFETY REQUIREMENTS. • Prescribes procedures for when upset or breakdown or the initiation of safety measures is expected to result in an excess emissions event.
Facility Wide	135	Yes	EXCESS EMISSIONS REPORTS. • Written reports for each excess emissions event must be submitted to the Department within 15 days after the beginning of the event.
Facility Wide	136	Yes	EXCESS EMISSIONS RECORDS. • Records of excess emissions must be maintained for 5 years.
Facility Wide	157	Yes	TEST METHODS AND PROCEDURES. • Establishes procedures and requirements for test methods and results.
Facility Wide	161	Yes	TOXIC SUBSTANCES. • Toxic contaminants shall not be emitted as to injure or unreasonably affect human or animal life or vegetation.
Facility Wide	200	Yes	PROCEDURES AND REQUIREMENTS FOR PERMITS TO CONSTRUCT. • This application complies with the procedures and requirements of the PTC permitting process.
Facility Wide	201	Yes	PERMIT TO CONSTRUCT REQUIRED.
Facility Wide	202	Yes	APPLICATION PROCEDURES.
Facility Wide	203	Yes	PERMIT REQUIREMENTS FOR NEW AND MODIFIED STATIONARY SOURCES.
Facility Wide	210	Yes	DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARDS.
Facility Wide	211	Yes	CONDITIONS FOR PERMITS TO CONSTRUCT.
Facility Wide	212	Yes	OBLIGATION TO COMPLY.
Facility Wide	213	Yes	PRE-PERMIT CONSTRUCTION.

Emission Unit	Citation under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
Facility Wide	214	No	DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE FOR NEW AND RECONSTRUCTED MAJOR SOURCES OF HAZARDOUS AIR POLLUTANTS. • The facility is not a major source of HAP.
Facility Wide	300	Yes	PROCEDURES AND REQUIREMENTS FOR TIER I OPERATING PERMITS. • The Caldwell facility is a major source with respect to Tier I operating permit program. The facility's carbon monoxide, oxides of nitrogen, and particulate matter emissions exceed 100 tons per year.
Facility Wide	301	Yes	REQUIREMENT TO OBTAIN TIER I OPERATING PERMIT
Facility Wide	311	Yes	STANDARD PERMIT APPLICATIONS
Facility Wide	312	Yes	DUTY TO APPLY
Facility Wide	313	Yes	TIMELY APPLICATION
Facility Wide	314	Yes	REQUIRED STANDARD APPLICATION FORM AND REQUIRED INFORMATION
Facility Wide	315	Yes	DUTY TO SUPPLEMENT OR CORRECT APPLICATION
Facility Wide	317	Yes	INSIGNIFICANT ACTIVITIES
Facility Wide	368	Yes	EXPIRATION OF PRECEDING PERMITS
Facility Wide	387	Yes	REGISTRATION AND REGISTRATION FEES
Facility Wide	388	Yes	APPLICABILITY
Facility Wide	389	Yes	REGISTRATION
Facility Wide	390	Yes	REQUEST FOR INFORMATION
Facility Wide	391	Yes	REGISTRATION FEE
Facility Wide	392	Yes	REGISTRATION FEE ASSESSMENT
Facility Wide	393	Yes	PAYMENT OF TIER I REGISTRATION FEE
Facility Wide	577	Yes	AMBIENT AIR QUALITY STANDARDS FOR SPECIFIC POLLUTANTS.
Boilers, Dryers, and AMUs	585	Yes	TOXIC AIR POLLUTANTS NON-CARCINOGENIC INCREMENTS
Boilers, Dryers, and AMUs	586	Yes	TOXIC AIR POLLUTANTS CARCINOGENIC INCREMENTS
Boilers 8, 9, and 10	590	No	NEW SOURCE PERFORMANCE STANDARDS • The facility's boilers are not subject to NSPS Subpart Dc because they were built prior to the applicability date and have not been modified since they were installed at the facility. The propose Line 4 fryer project will not affect their NSPS applicability. No NSPS Subparts apply to the emission units involved in the proposed Line 4 fryer project.
Facility Wide	591	No	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS • The Caldwell facility is not a major source of HAP and as such the NESHAP program does not apply to this facility.
Facility Wide	600	Yes	RULES FOR CONTROL OF OPEN BURNING
Facility Wide <i>except for the AMUs because they do not vent directly to atmosphere.</i>	625	Yes	VISIBLE EMISSIONS. • A person shall not emit an air pollutant from any point of emission for a period or periods aggregating more than 3 minutes in any 60-minute period that is greater than 20% opacity. • Prescribes test methods and procedures for performance testing.
Facility Wide	650	Yes	RULES FOR CONTROL OF FUGITIVE DUST.
Facility Wide	651	Yes	GENERAL RULES. • Reasonable precautions shall be taken to prevent particulate matter from becoming airborne.

Emission Unit	Citation under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
Boilers 8, 9, and 10	676	Yes	FUEL BURNING EQUIPMENT – PARTICULATE MATTER. STANDARDS FOR NEW SOURCES <ul style="list-style-type: none"> • The Caldwell facility's boilers combust only gaseous fuels. All three boilers are limited to 0.015 gr/dscf particulate matter emissions.
Line 1 Fryer, Line 1 Dryer, Line 4 Fryer	701	Yes	PARTICULATE MATTER – NEW EQUIPMENT PROCESS WEIGHT LIMITATIONS. <ul style="list-style-type: none"> • These sources were all installed at the Caldwell facility after October 1, 1979, the applicability date for this section. As such, the PM limits established in this section apply to these sources.
Line 6 Fryer, Line 6 Dryer	702	Yes	PARTICULATE MATTER – EXISTING EQUIPMENT PROCESS WEIGHT LIMITATIONS. <ul style="list-style-type: none"> • These sources were all installed at the Caldwell facility before October 1, 1979, the applicability date for this section. As such, the PM limits established in this section apply to these sources.
Facility Wide	776	Yes	GENERAL RULES. <ul style="list-style-type: none"> • Odorous gases, liquids or solids shall not be emitted as to cause air pollution.

APPENDIX E

Dispersion Modeling Analysis Correspondence

From: Kevin.Schilling@deq.idaho.gov [mailto:Kevin.Schilling@deq.idaho.gov]
Sent: Wednesday, April 25, 2007 9:20 AM
To: Sean Williams
Cc: William.Rogers@deq.idaho.gov
Subject: RE: Modeling for PTC Application at Simplot Caldwell

Sean,

The following is what I understand of the proposed project at the Simplot Caldwell facility:

- The only new emissions source will be the fryer.
- The new fryer will replace an existing fryer and an existing boiler will be shut down.
- Emissions from the fryer will be exhausted to the existing WESP and vented through the existing emissions stack.
- The flow parameters of the WESP stack will not change.
- Emissions from the new fryer will not exceed existing permit allowable rates for the existing fryer.

The "project" for this minor source permitting action is considered removal of the existing fryer, installation of the new fryer, and removal of the boiler. Since the emissions location and flow parameters of the fryer will not change, emissions to compare to the modeling thresholds are the emissions from the new unit with the emissions from the existing unit subtracted from that. In this case, no modeling is required because this value is essentially 0.0 lb/hr.

If emissions from the new fryer were not emitted at the same location as the existing fryer (or if flow parameters were substantially different), then DEQ would likely require you to model emissions from the new unit along with negative emissions from the existing unit to evaluate whether there is a significant contribution.

Please submit a copy of this email with the application as documentation for not conducting an air impact analysis.

Thank you,

Kevin Schilling
Stationary Source Modeling Coordinator
Idaho Department of Environmental Quality
208 373-0112

From: Sean Williams [mailto:swilliams@geomatrix.com]
Sent: Tue 4/24/2007 1:18 PM
To: Kevin Schilling
Subject: Modeling for PTC Application at Simplot Caldwell

Hello Kevin

As we just discussed on the phone, we are preparing to submit a PTC application on behalf of the J.R. Simplot Company's Caldwell facility. Simplot is proposing to permanently remove one natural gas-fired dryer from service, and replace an existing fryer with a new fryer. Like the existing fryer, the proposed fryer's exhaust will be routed through the facility's wet electrostatic precipitator (WESP). The proposed project will not change the dispersion characteristics or increase the emission rates associated with the WESP because the new fryer will have lower uncontrolled emissions than the existing fryer. Simplot has source test data demonstrating the reduction in uncontrolled emission rates. The WESP emissions will not increase and the Line 4 dryer's emissions will be eliminated; overall, the project will decrease the facility's emissions.

We completed a facility-wide modeling analysis for the Caldwell facility a few years ago using ISCST3. That modeling demonstrated compliance with all ambient standards. The only difference between our last ISCST3 analysis and an AERMOD analysis would be eliminating the Line 4 dryer.

Will DEQ allow us to use the previous ISCST3 analysis with the PTC application for the Line 4 fryer project?

Please feel free to call with any questions.

Thank you,

Sean

Sean Williams
Geomatrix Consultants
19203 36th Avenue West, Suite 101
Lynnwood, Washington 98036-5772
General Line: 425-921-4000
Direct Line: 425-921-4012
Fax: 425-921-4040

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